

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**BOARD OF TRUSTEES OF THE AFTRA
RETIREMENT FUND, in its capacity as a
fiduciary of the AFTRA Retirement Fund,
individually and on behalf of all others
similarly situated**

Plaintiff,

- against -

JP MORGAN CHASE BANK, N.A.,

Defendant.

**DECLARATION OF CARYN DONLY WITH
RESPECT TO NOTIFICATION**

09 Civ. 686 (SAS)

**BOARD OF TRUSTEES OF THE
IMPERIAL COUNTY EMPLOYEES'
RETIREMENT SYSTEM, in its capacity as a
fiduciary of the Imperial County Employees'
Retirement System, individually and on behalf
of all others similarly situated**

Plaintiff,

- against -

JP MORGAN CHASE BANK, N.A.,

Defendant.

09 Civ. 3020 (SAS)

**THE INVESTMENT COMMITTEE OF THE
MANHATTAN AND BRONX SURFACE
TRANSIT OPERATING AUTHORITY
PENSION PLAN, in its capacity as a fiduciary
of the MaBSTOA Pension Plan, individually
and on behalf of all others similarly situated**

Plaintiff,

- against -

JP MORGAN CHASE BANK, N.A.,

Defendant.

09 Civ. 4408 (SAS)

I, Caryn Donly, have been fully sworn according to law, depose and say as follows:

1. I am a Senior Project Administrator for Rust Consulting, Inc. ("Rust"). My business address is 625 Marquette Avenue, Suite 880, Minneapolis, Minnesota 55402-2469. My telephone number is 612-359-2811. I am over twenty-one years of age and authorized to make this declaration on behalf of Rust Consulting and myself.
2. Rust has extensive experience in class action matters, having provided services in class action lawsuits affecting millions of Class Members in cases involving antitrust, securities fraud, property damage, employment discrimination, product liability, insurance and consumer issues. We have provided notification and/or claims administration services in more than 2,500 class action cases.
3. Rust Consulting was engaged by Barroway Topaz Kessler Meltzer & Check, LLP ("Class Counsel") to provide class certification mailing services in the *JP Morgan Chase Securities Lending Litigation* (the "Class Action"). Rust's duties included: a) preparing, printing, and mailing to Class Members the *Notice of Pendency of Class Action* (the "Class Notice"); b) preparing, printing, and mailing to certain Class Members the *Supplemental Notice of Pendency of Class Action* (the "Supplemental Class Notice"); c) receipt of Requests for Exclusion submitted by Class Members; d) establishing a toll-free telephone number for Class Members to call with questions about the Class Action; and for such other tasks as the Parties mutually agree or the Court orders Rust to perform.
4. Rust Consulting obtained a Post Office box (under the name of JP Morgan Securities Lending Litigation Administrator, c/o Rust Consulting, Inc., P.O. Box 22, Minneapolis,

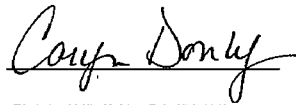
MN 55440-0022) for receiving Requests for Exclusion, undeliverable mail, and other communications about the Class Action.

5. A toll-free telephone number was included in the Class Notice for the purpose of allowing Class Members to listen to pre-recorded information about the Class Action, leave a message for Class Counsel, or call Class Counsel directly. The toll free telephone number included in the Class Notice was 1-866-591-7247.
6. On September 23, 2010, Rust received text for the Class Notice from Class Counsel. A draft of the Class Notice was prepared by Rust and approved by Class Counsel.
7. On September 23, 2010, Class Counsel provided Rust with a mailing list (the "Class List") containing the plan or entity and contact name and address for the plan or entity for each potential Class Member. The Class List contained data for 76 potential Class Members.
8. On September 30, 2010, Class Notices were mailed to 76 Class Members contained in the Class List via First Class Mail.
9. On October 25, 2010, Rust received text for the Supplemental Class Notice from Class Counsel. A draft of the Supplemental Class Notice was prepared by Rust and approved by Class Counsel.
10. On October 26, 2010, at the direction of Class Counsel, Supplemental Class Notices were mailed to 19 Class Members via First Class Mail.

11. As of this date, Rust has received two (2) Requests for Exclusion from the Class Action.

True and correct copies of the Requests for Exclusion are attached hereto as Exhibit A.

I declare, under penalty of perjury, under the laws of the State of New York and the United States, that the foregoing is true and correct to the best of my knowledge. Executed this 23rd day of November, 2010 in Minneapolis, Minnesota.

A handwritten signature in cursive script, reading "Caryn Donly", written in black ink.

CARYN DONLY